

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

T-M VACUUM PRODUCTS, INC.,	§	
	§	
PLAINTIFF	§	CASE NO. 07-4108
	§	
VS.	§	
	§	
TAISC, INC., d/b/a GLOBALEASE	§	
SOLUTIONS,	§	
	§	
DEFENDANT	§	
	§	

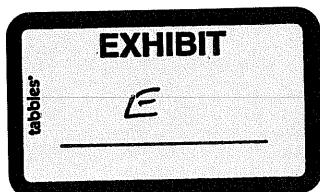
DECLARATION OF H. MILES COHN IN SUPPORT OF PLAINTIFF'S  
REQUEST FOR AN AWARD OF ATTORNEY'S FEES IN CONNECTION  
WITH PLAINTIFF'S MOTION TO COMPEL POST-JUDGMENT DISCOVERY

1. My name is H. Miles Cohn. I am the attorney in charge for the Plaintiff, T-M Vacuum Products, Inc. I have personal knowledge of each of the matters stated herein, all of which are true and correct.

2. I graduated from Harvard Law School in 1980. I served for one year as a law clerk for the Honorable Carolyn Dineen King, Judge on the United States Court of Appeals for the Fifth Circuit. Since 1981, I have been engaged in the active practice of law in Houston, focusing on commercial litigation and business bankruptcy disputes. I am familiar with attorney's fees customarily charged in commercial litigation in Houston.

3. I first noticed Defendant's post-judgment deposition on August 4, 2008. Defendant's counsel requested an extension of the deposition date, after which I had a number of telephone calls and emails with Defendant's counsel and sent two letters requesting a new date. We eventually agreed on a deposition date, but on the eve of that date, I was advised by Defendant's counsel that the deponent, Mr. Berry, was in Bulgaria and would not attend. I then prepared Defendant's Motion to Compel Post-Judgment Discovery, a proposed Order Compelling Discovery, this Declaration, a Motion for Expedited Hearing, and a proposed Order Setting Expedited Hearing. I estimate that through the disposition of the Motion to Compel, I will have worked approximately 4 hours in connection with the Motion to Compel, which at my hourly rate of \$275, amounts to attorney's fees of approximately \$1,100.

4. In my opinion, \$1,100 is reasonable and necessary for the legal work required in connection with Plaintiff's Motion to Compel.



I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 30<sup>th</sup> day of October, 2008.

/s/ H. Miles Cohn

H. Miles Cohn